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11		
12	Attorneys for NextEra Energy, Inc. et al.	
12	UNITED STAT	FFS DISTRICT COURT
13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
		AND DIVISION
14	_	
	In re:	USDC ND CA Case No. 4:19-cv-00599-HSG
15		
16	PG&E CORPORATION,	Adversary Proceeding No. 19-03003-DM
10	_	
17	- and -	Chapter 11 Case Nos. 19-30088-DM &
	PACIFIC GAS AND ELECTRIC	19-30089-DM
18	COMPANY,	Chapter 11
	COMPANT,	Chapter 11
19	Debtors.	(Jointly Administered)
20		
20	PG&E CORPORATION; PACIFIC GAS	NOTICE OF PENDENCY OF OTHER
21	AND ELECTRIC COMPANY,	ACTION OR PROCEEDING
	Plaintiffs,	(Case No, 4:19-cv-00781-HSG)
22	Vic	
	VS.	
23	FEDERAL ENERGY REGULATORY	
24	COMMISSION,	
24	Defendant.	
25		
26		
_	D 1010 011 0	O' 11 1D 1 /4 /4 1D 1 W 37 D
27	Pursuant to Rule 3-13 of this Court's	s Civil Local Rules (the "Local Rules"), NextEra

Energy, Inc. and NextEra Energy Partners, L.P. (together, "NextEra"), intervenor-defendants in

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the above-captioned adversary proceeding (the "Adversary Proceeding") and movants in this Court, hereby file this *Notice of Pendency of Other Action or Proceeding*, and state as follows:

The action styled PG&E Corp., et al. v. Fed. Energy Regulatory Comm'n, No. 4:19-cv-00781-HSG (N.D. Cal.) (the "FERC Withdrawal Action" and, together with the above-captioned action, the "Withdrawal Actions") "involves all or a material part of the same subject matter and all or substantially all of the same parties," Local Rule 3-13(a), as the above-captioned action. The FERC Withdrawal Action pertains to the Federal Energy Regulatory Commission's ("FERC") motion to withdraw the reference of the Adversary Proceeding to the Bankruptcy Court. ¹ The above-captioned action pertains to NextEra's motion (in which numerous intervenor-defendants joined) to withdraw the reference of the same Adversary Proceeding to the Bankruptcy Court (together, the "Withdrawal Motions").²

The two Withdrawal Motions present precisely the same legal question: whether this Court is required to withdraw the reference of the Adversary Proceeding to the Bankruptcy Court on the grounds that "resolution of the [Adversary Proceeding] requires consideration of both title 11 and other laws of the United States regulating organizations or activities affecting interstate commerce." 28 U.S.C. § 157(d). The parties with an interest in the two Withdrawal Actions are identical because each Withdrawal Motion seeks withdrawal of the reference of the same underlying Adversary Proceeding.

NextEra submits that in light of the overlap in legal issues and parties, coordination and/or consolidation of the Withdrawal Actions would conserve the resources of the Court and the parties and promote an efficient determination of the Withdrawal Motions.

[Remainder of page intentionally left blank]

See Docket No. 1 in FERC Withdrawal Action.

The Adversary Proceeding was automatically referred to the Bankruptcy Court in accordance with this Court's General Order No. 24 § 1.01(a) (adopted Dec. 27, 1982, last amended Feb. 22, 2016).

1	DATED: February 20, 2019	/s/ Samuel M. Kidder
2		Kenneth N. Klee David M. Stern
3		Samuel M. Kidder KLEE, TUCHIN, BOGDANOFF & STERN LLP
4		-and-
5		
6		Howard Seife (admitted <i>pro hac vice</i>) NORTON ROSE FULBRIGHT US LLP
7		Attorneys for NextEra Energy, Inc. et al.
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1	STATE OF CALIFORNIA)		
2	CITY OF LOS ANGELES)		
3	I, Shanda D. Pearson, am employed in the city and county of Los Angeles, State of		
4	California. I am over the age of 18 and not a party to the within action; my business address is 1999 Avenue of the Stars, 39 th Floor, Los Angeles, California 90067.		
5	On February 20, 2019, I caused to be served the following document in the manner stated		
6	below:		
7	NOTICE OF PENDENCY OF OTHER ACTION OR PROCEEDING		
8		TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was	
9		served by the court via NEF and hyperlink to the document. On February 20, 2019, I	
10 11		checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below.	
12		(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S.	
13		Postal Service on that same day with postage thereon fully prepaid at Los Angeles,	
14 15		California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.	
16		(BY OVERNIGHT DELIVERY) By sending by FedEx and/or USPS Express Mail to the addressee(s) as indicated on the attached list.	
17 18		(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.	
19		(PERSONAL DELIVERY) I arranged for service on the following persons and/or entities by personal delivery.	
20	I declare under penalty of perjury, under the laws of the State of California and the United		
21	States of America that the foregoing is true and correct.		
22	Executed on February 20, 2019 at Los Angeles, California.		
23	/s/ Shanda D. Pearson Shanda D. Pearson		
24			
25			
26			
27			

1	NEF/ECF LIST:	
2	Peter J. Benvenutti pbenvenutti@kellerbenvenutti.com	
3	Navtej Singh Dhillon Navi. Dhillon@bakerbotts.com, ken.hartley@bakerbotts.com, ECENotions@bakerbotts.com, payi.dhillon 0358@acf pagarners.com	
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6	• Jonathan D Forstot jonathan.forstot@troutman.com, john.murphy@troutman.com, marcus.hidalgo@troutman.com	
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12	 2972@ecf.pacerpro.com Howard Seife howard.seife@nortonrosefulbright.com 	
13	David Marc Stern dstern@ktbslaw.com	
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15	SERVED VIA OVERNIGHT DELIVERY:	
16		
	Hon. Haywood S. Gilliam, Jr., United States District Judge United States District Court, Oakland Division	
17	1301 Clay Street, Suite 400 S	
18	Oakland, CA 94612	
19		
	Hon. Dennis Montali, United States Bankruptcy Judge	
20	Mailbox 36099	
21	San Francisco, CA 94102	
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